

L1630200005-St. Clair  
Saught Saugt  
Superfund GL

EXHIBIT

5  
E.6

Monsanto

FROM (NAME & LOCATION): Robert L. Harness - William G. Krummrich Plant

DATE: October 27, 1975

cc: P.E. Heisler  
C.F. Buckley  
M.R. Foresman  
J.C. Smith  
B.R. Williams  
J.F. Nemeth

SUBJECT: ILL. EPA INSPECTION OF LANDFILL

REFERENCE: Memo Oct. 10, 1975 R.L.H. to  
R.W. Flint, et.al.

TO:

R.W. Flint  
A. Gallion  
P.S. Park  
D.B. Hosmer  
M.A. Pierle

147832

As outlined in the above referenced memo, the Illinois Environmental Protection Agency followed their landfill site inspection with a plant visit to W.G.K. On October 24, 1975, Dale Montgomery of the Collinsville Land Pollution Control Surveillance Office, and Mark Taylor of the Springfield Land Pollution Control Section visited W.G.K. to discuss two items:

- a) A list of materials being disposed of in the chemical landfill.
- b) Landfill operation and control procedures.

In answer to their inquiries, I supplied them with a list of landfill materials, (reviewed by Corporate Law and MICC Environmental Protection), and verbally described a) our screening process involving corporate medical to determine which items are suitable for landfill; b) our procedures for transporting materials from the plant to the landfill, and c) our control measures to insure that only approved materials go to the landfill.

Their response to the above was as follows:

- a) In reviewing the list, both Mr. Montgomery and Mr. Taylor stated that they did not recognize any material of an obviously hazardous nature. Mr. Taylor was present specifically for this reason.
- b) They seemed quite satisfied with our procedure for determining which materials are "non-hazardous", and consequently approved for landfill.
- c) They likewise seemed satisfied with our security procedures, and with our ability to control the use of the landfill to approved items only.
- d) Mr. Montgomery stated that the Illinois EPA was actively working to prohibit landfill operations in Mississippi River flood plain areas. Despite his initial observation that our landfill wastes

seemed "non-hazardous", he stated that the Agency would "probably" officially notify us that we were being cited for disposal of hazardous wastes in an un-authorized (no permit issued) site, and furthermore that they would under no circumstances issue a permit for this site. To this I replied that Monsanto had reviewed each item on the landfill list in detail to insure that it was "non-hazardous", and would not prohibit us from operating the landfill under the permit exclusion clause in the Illinois Act.

- e) Mr. Montgomery offered to discuss alternate landfill sites which would be acceptable to the Illinois EPA. We agreed that this would be best done at a later date.
- f) The EPA will be collecting water samples from the landfill test wells on Tuesday, October 28, 1975. This has been done on several other occasions.

The meeting ended on a positive note. Mr. Montgomery stated that he would review our situation, and discuss his decision with me prior to taking any action. He told me that no "crash program" would be enforced on us, but did not indicate any timing for activity on their point. He was very inconclusive at this point, and led me to believe that he was giving equal thought to approving our present operations.

At this point, I recommended that we continue to operate the landfill as we are presently doing, and take no action until further notice by the EPA.

Let me know if you have questions.

*Robert L. Harness*

Robert L. Harness  
Environmental Control  
Wm. G. Krummrich Plant

/ab

001410